



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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August 22, 2012

VIA ECF

The Honorable Viktor V. Pohorelsky  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East,  
Brooklyn, NY 11201

Re: Andrew Abrahams v. City of New York, et al., 12-CV-2911 (ARR)(VVP)

Your Honor:

I am a Special Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, representing defendant City of New York in the above-referenced matter. I am writing to request an enlargement of time for defendant City to submit an answer or otherwise respond to plaintiff's complaint since we have not received an executed § 160.50 from plaintiff's counsel. Plaintiff's counsel Darius Wadia, Esq. consents to this request.

The Complaint was served on the City on June 11, 2012. On June 29, 2012, the City requested an enlargement of time to answer or respond to the complaint. On July 3, 2012, Your Honor granted the City's request for an enlargement of time to September 3, 2012 to respond to the Complaint. On June 28, 2012, this office forwarded to plaintiff a "Designation of Agent for Access to Sealed Records Pursuant to NYCPL § 160.50 (1)(d), so that the records pertaining to the plaintiff's stop could be accessed and so that this lawsuit could proceed in a timely fashion. In addition, on July 27, 2012, we forwarded a follow-up letter to plaintiff's counsel again requesting the § 160.50 release and a medical release. A copy of the letters are enclosed for your review. To date, we have still not received an executed § 160.50 release or a signed medical release.

As such, it is respectfully requested that Your Honor direct plaintiff to provide the City with a § 160.50 release and signed medical release by a date certain. Further, the City of New York requests a further enlargement of time to answer or otherwise respond to plaintiff's complaint from September 3, 2012 until forty five days after receipt of the § 160.50 release.

Thank you for the consideration of this request.

Respectfully submitted,

/s/

Deborah L. Mbabazi  
Special Assistant Corporation Counsel  
Special Federal Litigation Division

cc: Darius Wadia, Esq. (Via ECF)  
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Enc.